

0102-0231-0012

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California Fresh Carrot Advisory Board

Facsimile Information

TO (Company): Office of Pesticide Programs

Attention: Joseph Hogue

FAX Number: 703-305-5884

From: Ken Melban, Assistant Manager

Date: 5/1/2003

Number of pages (including this page): 2

FAX Number 559-591-5744**WARNING:**

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Mr. Joseph Hogue,

Attached you will find a letter from John Guerard, Board Member from the California Fresh Carrot Advisory Board, stating the California fresh carrot industry's position regarding the changes being considered by EPA for Section 18's. I will be meeting with Dan Rosenblatt and Rick Keigwin on May 8th, 2003, at 11:00 a.m. in D.C. for the purpose of gaining a better understanding of the registration process. At this meeting I intend to hand deliver this letter and possibly some others, and if you would like to join us please feel free to do so. I appreciate your serious consideration of the enclosed comments.

Respectfully submitted,



Ken Melban, Assistant Manager

California Fresh Carrot Research Advisory Board
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**California
FRESH CARROT
Advisory Board**

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Joseph Hogue
Field and External Affairs Division (7506C)
Office of Pesticide Programs, EPA

May 1, 2003
Docket ID No. OPP-2002-0231

Dear Mr. Hogue,

The Calif. Fresh Carrot Advisory Board wants to go on record supporting the proposed changes in the Section 18 petition criteria. We are especially supportive of the proposed changes to allow the States to renew Section 18 petitions based on the proposed criteria, and the proposed changes for determining economic loss when considering issuing a Section 18 registration.

We support the basic premise of allowing Section 18 registration for new pesticides where resistance management concerns exist. We think the appropriate criteria for allowing Section 18 petitions in resistance management are:

1. Allow documented scientific evidence both within and outside the U.S. to be used for the basis of a Section 18.
2. Documentation of resistance should be provided by Universities, USDA-ARS, company research labs, professional agricultural consultants or other appropriate governmental institutions.
3. Documented evidence of resistance should be used as a criteria for a Section 18 petition as soon as it has been verified. Waiting 1 or more years to determine pest resistance may be too long and only exacerbates the need for more applications.
4. Emergency exemption should be allowed for both chemicals in a different class and for those with a different mode of action.
5. Pesticide efficacy should be required for any chemical being requested for a Section 18 petition. Documentation and evidence should be provided to demonstrate effectiveness of proposed management strategies to manage resistance.
6. Noted resistance in related pest species should be considered in the Section 18 process.

We certainly hope that the criteria presented above is taken into consideration when the new regulations are made revising the Section 18 program.

Thank you for your consideration,

John Guerard
California Fresh Carrot Advisory Board

cc: Dan Rosenblatt, Rick Keigwin

Under Authority of the Department of Food and Agriculture, State of California